In the

SUPREME COURT OF MISSOURI

En Banc

Report of the Office of the Chief Disciplinary Counsel for the year 2025 together with the Financial Report of the Treasurer of the Advisory Committee Fund for 2025

ANDREA K. SPILLARS
Chief Disciplinary Counsel

IN THE

SUPREME COURT OF MISSOURI

EN BANC

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REPORT OF THE OFFICE OF CHIEF DISCIPLINARY COUNSEL FOR THE YEAR 2025 TOGETHER WITH THE FINANCIAL REPORT OF THE TREASURER OF THE ADVISORY COMMITTEE FUND FOR 2025

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To the Honorable Judges of The Supreme Court:

Comes now the Office of Chief Disciplinary Counsel, and respectfully reports to the Court on matters concluded during calendar year 2025 or pending on December 31, 2025.

I.

THE FOLLOWING DISCIPLINARY ACTIONS WERE TAKEN BY THE COURT DURING 2025 BASED ON PROCEEDINGS PROSECUTED BY THE OFFICE OF CHIEF DISCIPLINARY COUNSEL[1]

AMIRAULT, DAVID, Springfield, MO, Missouri Bar #68982

Disbarment: Violation of Rules 4-1.1, 4-1.3, 4-1.4(b), 4-1.15(a), 4-1.15(b), 4-1.15(c), 4-1.15(f), 4-1.5(e), 4-2.1, 4-3.2, 4-3.3(a)(1), 4-3.4(c), 4-5.4, 4-8.1(c), 4-8.4(b), 4-8.4(c), and 4-8.4(d). Date of Order: April 29, 2025.

BEARDEN, JOVANNA RENE'E, Nevada, MO, Missouri Bar #60294

Public Reprimand: Violation of Rules 4-1.1, 4-1.4(b), 4-1.5(a), 4-1.5(b), and 4-3.3. Date of Order: March 4, 2025.

BROWN, TYLER E., Kansas City, MO, Missouri Bar #73358

Surrendered license and disbarment. Date of Order: November 25, 2025.

CHAPMAN, BIANCA RALINE, Florissant, MO, Missouri Bar #65363

Interim suspension from the practice of law pursuant to provisions of Rule 5.23(a). Date of Order: August 15, 2025.

CHOLLET, CATHERINE, St. Louis, MO, Missouri Bar #63008

Interim suspension from the practice of law pursuant to provisions of Rule 5.21(b). Date of Order: July 3, 2025.

CRAWFORD, MICHAEL JAMES, Kansas City, MO, Missouri Bar #64799

Interim suspension from the practice of law pursuant to provisions of Rule 5.24. Date of Order: August 29, 2025.

CURE, KEVIN T., Joplin, MO, Missouri Bar #41064

Disbarment: Rule 5.20 (Reciprocal – Kansas); Violation of Rules 4-1.2(a), 4-1.3, 4-1.4(a), 4-1.16(a)(2), 4-1.16(a)(3), and 4-8.4(d). Date of Order: July 1, 2025.

[1] Often there are attorneys with the same or similar names. It is important to note the bar number and location of the individual.

DAVIS JR., LEON JAMES, Kansas City, MO, Missouri Bar #64462

Suspended from the practice of law and no petition for reinstatement shall be entertained by the Court for a period of six months: Rule 5.20 (Reciprocal – Kansas); Violation of Rule 4-8.4(b). Date of Order: March 4, 2025.

DENIGAN, JOSEPH E., St. Louis, MO, Missouri Bar #34348

Suspended from the practice of law and no petition for reinstatement shall be entertained by the Court for a period of six months: Rule 5.21 (Criminal Conviction). Date of Order: March 4, 2025.

GLICK, THOMAS GARY, St. Louis, MO, Missouri Bar #44769

Interim suspension from the practice of law pursuant to provisions of Rule 5.23(b)(2). Date of Order: October 7, 2025.

HOLLINGSWORTH, THOMAS EAGLETON, Hillsboro, MO, (now DeSoto, MO), Missouri Bar #54915

Suspended from the practice of law and no petition for reinstatement shall be entertained by the Court for a period of six months: Violation of Rules 4-4.4(a), 4-8.4(c), and 4-8.4(d). Date of Order: January 14, 2025.

HUANG, GRACE LEE, Taipei, Taiwan, Missouri Bar #71544

Suspended from the practice of law and no petition for reinstatement shall be entertained by the Court for a period of six months: Rule 5.20 (Reciprocal – United States Patent and Trademark Office); Violation of Rules 4-1.1, 4-1.3, 4-5.3(a), 4-5.5(a), 4-8.1(c), 4-8.4(c), and 4-8.4(d). Date of Order: May 2, 2025.

KING JR., ROY, Kansas City, MO, Missouri Bar #35005

Disbarment: Violation of Rules 4-1.15(a), 4-1.15(a)(5), 4-1.15(a)(7), 4-1.15(c), 4-1.15(f), and 4-8.4(c). Date of Order: May 27, 2025.

KOHN, MICHAEL ELLIOT, Clayton, MO, Missouri Bar #27006

Disbarment: Rule 5.21 (Criminal Conviction). Date of Order: July 1, 2025.

LAVERENTZ, SCHUYLER G., West Plains, MO, Missouri Bar #56892

Default Disbarment: Violation of Rules 4-1.3, 4-1.4, 4-3.4(c), 4-8.1(c), and 4-8.4(d). Date of Order: July 1, 2025.

LEE, PETER, Stockton, MO, Missouri Bar #55172

Surrendered license and disbarment: Violation of Rules 4-1.4, 4-1.15, 4-4.1, and 4-8.2. Date of Order: May 22, 2025.

MCCARTY, RYAN CHRISTOPHER, Lee's Summit, MO, Missouri Bar #62943

Suspended from the practice of law and no petition for reinstatement shall be entertained by the Court for a period of one year: Violation of Rules 4-1.9(c)(1) and 4-1.9 (c)(2). Date of Opinion: July 22, 2025.

MCNEAL, SYREETA LASHAWN, Columbia, MO, Missouri Bar #60207

Interim suspension from the practice of law pursuant to provisions of Rule 5.24. Date of Order: October 10, 2025.

MARTIN, ELIZABETH JEWEL, St. Louis, MO, Missouri Bar #56177

Interim suspension from the practice of law pursuant to provisions of Rule 5.23(a). Date of Order: April 9, 2025.

MASON, JUSTIN LAMAR, St. Louis, MO, Missouri Bar #62571

Disbarment: Violation of Rules 4-1.15(a), 4-1.15(a)(5), 4-1.15(a)(6), 4-1.15(a)(7), 4-1.15(d), 4-1.15(f), and 4-8.4(c). Date of Order: March 18, 2025.

PERRY, MATTHEW ALEXANDER, Columbia, MO, Missouri Bar #64079

Interim suspension from the practice of law pursuant to provisions of Rule 5.24. Date of Order: April 25, 2025.

PETRUSKA, PAUL ERIC, Frontenac, MO, Missouri Bar #46922

Suspended from the practice of law and no petition for reinstatement shall be entertained by the Court for a period of three years: Violation of Rules 4-1.2(a), 4-1.3, 4-1.4, 4-3.3, and 4-8.4(c). Date of Opinion: March 4, 2025.

RAINES, JENNIFER BENEDICT, Independence, MO, Missouri Bar #44855

Public Reprimand: Violation of Rules 4-1.4(b), 4-1.5(a), 4-1.5(b), and 4-3.3. Date of Order: March 4, 2025.

REAGAN-PURSCHKE, RACHEL ELIZABETH, Union, MO, Missouri Bar #65123

Interim suspension from the practice of law pursuant to provisions of Rule 5.24. Date of Order: August 27, 2025.

RIEGERIX, JOSEPH RYAN, Lake St. Louis, MO, (now Denver, CO), Missouri Bar #66372

Suspension, suspension stayed, placed on probation for one year: Rule 5.20 (Reciprocal – Colorado); Violation of Rules 4-1.3, 4-1.4(a)(1), 4-1.4(b), 4-5.5(a), and 4-8.4(c). Date of Order: September 30, 2025.

ROSWOLD, JAMES MICHAEL, Kansas City, MO, Missouri Bar #41053

Suspension, suspension stayed, placed on probation for two years: Violation of Rules 4-1.1, 4-1.3, 4-1.4, 4-8.4(a), and 4-8.4(c). Date of Order: May 27, 2025.

SALVETER, III, THEODORE C., Springfield, MO, Missouri Bar #17401

Suspended from the practice of law and no petition for reinstatement shall be entertained by the Court for a period of six months: Rule 5.21 (Criminal Conviction). Date of Order: December 16, 2025.

SCABAVEA, MARK E., Lakewood, CO, Missouri Bar #61533

Disbarment: Rule 5.20 (Reciprocal – Colorado); Violation of Rules 4-1.3, 4-1.4(a), 4-1.15(c), 4-1.15(d), 4-1.15(f), 4-1.16(d), 4-1.5(b), 4-3.2, 4-8.4(c), and 4-8.4(d). Date of Order: December 16, 2025.

SMALLWOOD, CLARENCE T., St. Louis, MO, Missouri Bar #41058

Suspended from the practice of law and no petition for reinstatement shall be entertained by the Court for a period of six months: Violation of Rules 4-5.5(a), 4-5.5(b)(2), 4-8.4(c), and 4-8.4(d). Date of Order: March 18, 2025.

SMITH, CODY P., Springfield, MO, Missouri Bar #71596

Immediate suspension from the practice of law pursuant to provisions of Rule 5.24. Date of Order: February 25, 2025. Supreme Court No. SC100991.

Default Disbarment: Violation of Rules 4-1.3, 4-1.4, 4-1.5, 4-3.4(c), 4-8.1(a), 4-8.4(c), and 4-8.4(d). Date of Order: December 16, 2025. Supreme Court No. SC101289.

UPCHURCH, GORDON R., Washington, MO, Missouri Bar #28212

Suspended from the practice of law and no petition for reinstatement shall be entertained by the Court for a period of six months: Violation of Rules 4-4.1 and 4-8.4(c). Date of Order: September 30, 2025.

WARREN, KYLE LESLEY, Poplar Bluff, MO, Missouri Bar #57654

Disbarment: Violation of Rules 4-1.1, 4-1.3, 4-1.4(a)(1), 4-1.4(b), 4-3.1, 4-3.2, 4-3.3(a)(1), and 4-8.4(c). Date of Order: November 25, 2025.

WEBSTER, SPENCER JORDAN, Kansas City, MO, Missouri Bar #70728

Default Disbarment: Violation of Rules 4-1.1, 4-1.3, 4-1.4, 4-1.15, 4-1.16, 4-3.2, 4-3.4(c), 4-8.1(c), and 4-8.4(c). Date of Order: April 4, 2025.

WILES II, JOHN NELSON, Springfield, MO, (now Fair Grove, MO), Missouri Bar #67313

Interim suspension from the practice of law pursuant to provisions of Rule 5.24. Date of Order: May 15, 2025.

WISKE, JASON, Pittsburg, KS, Missouri Bar #49487

Suspended from the practice of law and no petition for reinstatement shall be entertained by the Court for a period of six months: Rule 5.20 (Reciprocal – Kansas); Violation of Rules 4-1.1, 4-1.3, 4-3.2, and 4-8.4(d). Date of Order: April 1, 2025.

WOEHLECKE, BYRON WILLIAM, Kansas City, MO, Missouri Bar #45941

Suspended from the practice of law and no petition for reinstatement shall be entertained by the Court for a period of three years: Violation of Rules 4-1.3, 4-1.4, 4-1.4(a), 4-1.15(c), 4-1.15(f), 4-1.16(d), 4-1.22, 4-3.4(c), 4-8.1(c), 4-8.4(a), 4-8.4(c), and 4-8.4(d). Date of Order: May 27, 2025.

WURM, WILLIAM R., St. Louis, MO, Missouri Bar #68912

Interim suspension from the practice of law pursuant to provisions of Rule 5.24. Date of Order: November 6, 2025.

II.

THE FOLLOWING DISCIPLINARY ACTIONS WERE PENDING BEFORE THE COURT AT THE CLOSE OF 2025 BASED ON PROCEEDINGS PROSECUTED BY THE OFFICE OF CHIEF DISCIPLINARY COUNSEL

AKERS, DAVID SCOTT, Hollister, MO, Missouri Bar #37792
Suspension, suspension stayed, placed on probation for eighteen months: Violation of Rules 4-1.15, 4-5.4, and 4-8.1. Date of Order: January 13, 2026.

ANDERSON, SCOTT W., Lake Quivira, KS, Missouri Bar #54771
Disbarment: Rule 5.21 (Criminal Conviction). Date of Order: January 13, 2026.

ARENSBERG, MARK W., Overland Park, KS, Missouri Bar #40203
Suspension, suspension stayed, placed on probation for one year: Violation of Rule 4-8.4(d). Date of Opinion: January 13, 2026.

CAMPBELL, SCOTT L., Platte City, MO, Missouri Bar #37806
Suspension, suspension stayed, placed on probation for six months: Violation of Rule 4-8.4(g). Date of Order: April 21, 2026.

DEMPSEY, MICHAEL C., Union, MO, Missouri Bar #32154
Surrendered license and disbarment. Date of Order: January 16, 2026.

DIEHL JR., JOHN J., Clayton, MO, Missouri Bar #42400
Surrendered license and disbarment. Date of Order: January 29, 2026.

GOHN, ADAM EDWARD, Chicago, IL, Missouri Bar #65533
Disbarment: Violation of Rules 4-1.3, 4-1.4(a)(1), 4-1.5(a), 4-1.5(b), 4-1.15(a), 4-1.15(a)(6)(B), 4-1.15(a)(7), 4-1.15(c), 4-1.15(d), 4-1.15(f), 4-1.16(d), 4-8.1(c), and 4-8.4(c). Date of Order: June 2, 2026.

GOLDSTEIN, BRIAN TODD, Overland Park, KS, Missouri Bar #50191
Disbarment: Violation of Rules 4-1.15(a) and 4-8.4(c). Date of Opinion: January 23, 2026.

HANSON, MICHAEL R., O'Fallon, MO, Missouri Bar #35436
Disbarment: Violation of Rules 4-1.5(a), 4-1.5(c), 4-1.5(e), 4-1.8(a), 4-1.15, and 4-8.4(c). Date of Order: January 13, 2026.

LIM, EDGAR EDWARD, St. Louis, MO, Missouri Bar #24838

Suspended from the practice of law and no petition for reinstatement shall be entertained by the Court for a period of two years: Violation of Rules 4-1.15(a), 4-1.15(a)(5), 4-1.15(c), 4-1.15(f), 4-3.4(c), and 4-8.1(c). Date of Order: April 21, 2026.

MADRIGAL III, MANFREDO MARTIN-MICHAEL, Geneva, IL, (now Inverness, IL), Missouri Bar #72576

Disbarment: Rule 5.21 (Criminal Conviction). Date of Order: March 31, 2026.

MEYER, SHAWN ANTHONY, Kansas City, MO, Missouri Bar #72934

Disbarment: Rule 5.21 (Criminal Conviction). Date of Order: January 13, 2026.

NACK, MICHAEL ROY, Clayton, MO, Missouri Bar #28964

Disbarment: Violation of Rules 4-1.15, 4-3.4(c), 4-5.5(a), 4-8.1, 4-8.4(b), and 4-8.4(c). Date of Order: February 24, 2026.

RANDAZZO-SCOTT, CIERRA, Belleville, IL, (now St. Louis, MO), Missouri Bar #74125

Disbarment: Rule 5.20 (Reciprocal – Illinois); Violation of Rules 4-3.3, 4-5.5, 4-8.1, and 4-8.4(c). Date of Order: January 13, 2026.

TAYLOR, SCOTT GREGORY, Springfield, MO, Missouri Bar #42820

Surrendered license and disbarment. Date of Order: April 17, 2026.

III. REINSTATEMENT PROCEEDINGS

A. DISCIPLINARY MATTERS

At the beginning of the year, 12 Missouri lawyers who had previously been disciplined had applications for reinstatement pending for processing by the Office of Chief Disciplinary Counsel. During the year, six additional applications for reinstatement were filed and referred to the OCDC for processing.

The OCDC processed a total of 18 disciplinary reinstatement applications during 2025. The status of those 18 applications is as follows:

Reinstated	**1**
Denied	**4**
Dismissed	**1**
Pending	**12**

One Petitioner Was Reinstated by the Supreme Court

1. Joseph V. Neill, St. Louis, MO, Missouri Bar #28472, reinstated on January 28, 2025. Petitioner was suspended on January 25, 2024.

Four Petitioners Were Denied Reinstatement by the Supreme Court

1. Daniel S. Cornacchione, Sr., Missouri Bar #54935, denied reinstatement. Petitioner was suspended on May 2, 2023.

2. Janise Nichole Lampley (now Ross), Missouri Bar #65565, denied reinstatement. Petitioner was disbarred on December 9, 2015.

3. James Tracy Madison, Missouri Bar #48405, denied reinstatement. Petitioner was suspended on May 22, 2009.

4. Tabitha Sue Pruitt, Missouri Bar #49271, denied reinstatement. Petitioner was suspended on February 25, 2014.

One Petition Was Dismissed by the Supreme Court

1. Gerald Michael Dunne, Missouri Bar #29150. Petitioner filed motion to dismiss petition for reinstatement on November 20, 2025. Petitioner was suspended on May 13, 2010.

B. OTHER REINSTATEMENTS

Tax

Lawyers may be suspended pursuant to Rule 5.245 if they were delinquent on state tax or failed to file a tax return. During 2025, the OCDC investigated and processed 29 tax suspension applications for reinstatement. Eight were reinstated. Three applications were denied. Three applications were dismissed. Fifteen applications remained pending at the end of 2025.

Fee

Lawyers may be suspended automatically under Rule 6.01(f) for non-payment of annual enrollment fees. If their non-payment exceeds three years, they must apply for reinstatement under Rule 5.28. In 2025, the OCDC investigated and processed eight applications for reinstatement by those lawyers. Two were reinstated. One application was dismissed. Five applications remained pending at the end of 2025.

MCLE

Lawyers may be suspended for non-compliance with Mandatory Continuing Legal Education requirements under Rule 15.06(f). During 2025, the OCDC investigated and processed eight MCLE suspension applications for reinstatement. Two were reinstated. One application was dismissed. Five applications remained pending at the end of 2025.

Return to Active Status

Lawyers may elect to become inactive under Rule 6.03. Per Rule 6.06, the OCDC investigated and processed 111 inactive lawyers' applications for reinstatement. One hundred five were returned to active status. Three applications were dismissed. Three applications remained pending at the end of 2025.

IV. COMPLAINTS RECEIVED IN 2025 AND ACTIONS THEREON

2,535 complaints of attorney misconduct were received in 2025. The following actions were taken on complaints received in 2025:

811 Formal Investigations opened
- ***465*** Cases investigated by Regional Disciplinary Committees
- ***346*** Cases investigated by OCDC

1,689 Investigations not opened *(In certain instances, OCDC does not open an investigation until after related litigation is completed.)*

21 Referred to Complaint Resolution Committee *(*See Missouri Bar Complaint Resolution Activity Report attached.)*

14 Placed in "Inquiry" status *(These cases were not opened but were monitored to determine whether an investigation should be opened in the future.)*

A. Advisory Committee Review

Rule 5.11 permits complainants to seek review by the Advisory Committee in cases in which the OCDC or a Regional Disciplinary Committee investigated and found insufficient probable cause to believe that an attorney was guilty of professional misconduct that would justify discipline. In 2025, 51 complainants requested review. The Advisory Committee upheld the findings on 29 of these files and issued a guidance letter to two lawyers. The Committee assigned five of the review files for further investigation. Fifteen of these review files were pending with the Committee at the end of the year.

B. Fee Disputes

The Missouri Bar continues to provide a fee dispute resolution program. This program is valuable to lawyers and legal consumers by providing a forum for fee-related complaints to be addressed through a non-disciplinary structure. During the year, 25 complainants were referred to the Fee Dispute Committee as appropriate.

C. Overdraft Notification

In 2010, the Supreme Court amended the Rules of Professional Conduct to require financial institutions holding lawyer trust accounts to notify the OCDC in cases where the trust account is overdrawn. In 2025, the OCDC received 49 overdraft notifications. Many of these involved negligent or careless management of trust accounts, which were often handled by education and follow-up monitoring without discipline. Some overdrafts were more serious, either by scope of the problem or by the intention of the attorney. Various levels of discipline were necessary in these matters in order to protect the public and the integrity of the profession.

V. DISCIPLINE ACTION INITIATED

A. Admonitions

The OCDC administered 31 written admonitions and the Regional Disciplinary Committees administered 22 written admonitions to Missouri lawyers. (Total: 53 admonitions). In addition, 111 guidance letters were sent to lawyers by OCDC and the Regional Committees. Guidance letters are not disciplinary action, but are used to educate the attorney on ethical responsibilities or to alert the attorney that a particular course of conduct, if unchecked in the future, may cause additional complaints to be filed.

B. Investigation Summary

Region[2]	Investigations Pending 1/1/25	Investigations Opened in 2025	Investigations Completed in 2025
IV	85	146	136
X	66	165	136
XI	20	50	56
XV	76	127	98
OCDC	107	335	236

Region	Admonitions Issued in 2025	Guidance Letters Issued in 2025
IV	6	28
X	11	15
XI	3	10
XV	2	0
OCDC	31	58

[2] The geographical jurisdiction represented by the numerical Region designation is as follows: Region IV – judicial circuits 7, 16, and 17; Region X – judicial circuits 11, 21, and 23; Region XI – judicial circuit 22; and Region XV – Texas County in judicial circuit 25, Laclede County in judicial circuit 26, and judicial circuits 28, 29, 30, 31, 37, 38, 39, 44, and 46.

C. Filed Hearing Matters

FILING INFORMATIONS

In 2025, the OCDC and the Regional Disciplinary Committees filed Informations (the formal charging document) on 36 files. "Files" indicate individual complaints against attorneys. An Information against one attorney may include charges involving multiple files.

Nineteen Informations, representing 84 complaint files, were pending before the Advisory Committee and Disciplinary Hearing Panels at the beginning of 2025. Disciplinary Hearing Panels conducted 14 hearings involving 33 files. Three default Informations were filed directly in the Supreme Court.

D. Cases filed at the Supreme Court

RULE 5.19

In 2025, one disciplinary hearing panel decision was approved by the Missouri Supreme Court, pursuant to Rule 5.19(a), without requirement of briefing and argument.

Informant's briefs were filed in the Supreme Court in 11 cases. Of those 11 cases, two were heard because the Informant did not concur in a DHP's recommended sanction (pursuant to Rule 5.19(b)), six were heard because the Respondent did not concur in a DHP's recommended sanction (pursuant to Rule 5.19(b)), one was heard because neither party concurred in a DHP's recommended sanction (pursuant to Rule 5.19(b)), and two were heard when the Court rejected the DHP's recommended sanction (Rule 5.19(c)). Fifteen disciplinary cases appeared on the Court's oral argument calendar in 2025.

RULE 5.20

Seven reciprocal discipline cases, based on adjudication of misconduct in other jurisdictions, were filed in 2025: *In re Cure*, SC101059, *In re Davis*, SC100931, *In re Huang*, SC101029, *In re Randazzo-Scott*, SC101386, *In re Riegerix*, SC101170, *In re Scabavea*, SC101334, and *In re Wiske*, SC100940.

RULE 5.21

During 2025, in one case, the Court issued an interim suspension pursuant to Rule 5.21(b): *In re Chollet,* SC101122.

During 2025, Informations were filed under Rule 5.21(g) against five attorneys whose criminal cases were finally disposed but who had not previously been suspended on an interim basis: *In re Anderson*, SC101377, *In re Kohn*, SC101090, *In re Madrigal*, SC101364, *In re Meyer*, SC101331, and *In re Salveter*, SC101371.

RULE 5.23

In 2025, an Information was filed under Rule 5.23(b) against four attorneys based on the inability to competently represent the interest of clients by reason of physical or mental condition and the Court issued interim suspensions in three cases: *In re Chapman*, SC101216, *In re Glick*, SC101260, and *In re Martin,* SC101045.

RULE 5.24

Seven Informations requesting interim suspension for substantial threat of irreparable harm, were filed in 2025, and the Court issued interim suspensions in all seven cases: *In re Crawford*, SC101241, *In re McNeal*, SC101292, *In re Perry*, SC101075, *In re Reagan-Purschke*, SC101243, *In re Smith*, SC100991, *In re Wiles*, SC101105, and *In re Wurm*, SC101357.

RULE 5.25

In 2025, five attorneys applied to surrender their license under Rule 5.25: *In re Brown*, SC101312 (accepted November 25, 2025); *In re Dempsey*, SC101230 (accepted January 16, 2026); *In re Diehl*, SC101274 (accepted January 29, 2026), *In re Lee*, SC101015 (accepted May 22, 2025), and *In re Taylor*, SC101217 (accepted April 17, 2026). The OCDC filed a Report and Recommendation in each of these cases.

VI. LAWYER MONITORING

OCDC staff monitor lawyers' practices in four circumstances, all intended to improve the lawyers' likelihood of maintaining a successful practice and protecting the public. In 2025, the office monitored seven lawyers in the disciplinary diversion program established by Rule 5.105. The diversion program was created to help offenders who have engaged in relatively minor rule violations, often involving practice management.

Thirteen lawyers were monitored in 2025 while on probation under Rule 5.175, the rule permitting probation for lawyers whose conduct did not warrant disbarment. Also, the office was asked by the Supreme Court of Missouri and the Missouri Board of Law Examiners in 2025 to monitor the practice of five newly admitted lawyers. Finally, in 2025, the office monitored the practice of nine lawyers who were reinstated subject to an order of probation.

VII. UNAUTHORIZED PRACTICE OF LAW

The Office of Chief Disciplinary Counsel opened complaint files on four individuals and organizations alleged to have engaged in the unauthorized practice of law.

Some of these cases were referred to local prosecuting attorneys or to the Consumer Protection Division of the Missouri Attorney General's office. Others were resolved through communication with the company or individual.

Due to the workload and staff resources of OCDC, the office focused its efforts on conducting in-depth investigations in those cases where it appeared that widespread consumer fraud was occurring. Where appropriate, the office conducted investigations of complaints, and the office referred the materials to law enforcement for criminal prosecution as OCDC is only authorized to seek a civil injunction against a party for engaging in the unauthorized practice of law.

VIII. PRESENTATIONS BY OCDC STAFF

During 2025, OCDC staff gave presentations at Continuing Legal Education (CLE) seminars. The OCDC staff gave presentations to the following organizations: Bankruptcy Trustee Richard Fink; Bar Association of Metropolitan St. Louis; Fox-Smith; Jasper County Bar Association; Judicial College; Kansas City Metropolitan Bar Association; Missouri Banker's Association; Missouri Creditor's Bar; OSCA – Presiding Judges Meeting; St. Joseph Bar Association; Springfield Metropolitan Bar Association; United States District Court – Eastern Division; and University of Missouri – Kansas

City School of Law. The OCDC staff also spoke at several Missouri Bar CLEs and webinars.

IX. SIGNIFICANT ACTIVITIES IN 2025

Disciplinary Case Processing

During 2025, the Office of Chief Disciplinary Counsel (OCDC) received 2,535 complaints, a 37% increase from the average number of complaints received during the prior ten years.

The Supreme Court has established timeline standards for the disposition of pending cases that seek to complete 75 percent of investigations within six months and 90 percent of investigations within one year. The Court has also established a timeline standard for the initial determination whether or not to open an investigative file that seeks to have new complaints and reports reviewed within two weeks of receipt. The Chief Disciplinary Counsel makes quarterly reports to the Court regarding the system's performance against the disposition timeline standards and the initial determination timeline standard. During 2025, the OCDC and the disciplinary system did not meet the disposition timeline standard in any quarter. The OCDC did not meet its initial determination timeline standard in 2025.

Staff On-Boarding and Training

In 2025, the OCDC hired four new attorneys and developed an in-house training program for on-boarding. Attorney staff also participated in training by attending conferences offered by The Missouri Bar, the National Organization of Bar Counsel and the American Bar Association – Center for Professional Responsibility. Paralegals at the OCDC attended training through the Missouri Paralegal Association and the Organization of Bar Investigators, an organization affiliated with the National Organization of Bar Counsel.

SUMMARY OF DISCIPLINE ACTIONS

During 2025:

- **12** Twelve lawyers were disbarred;

- **24** Twenty-four lawyers were suspended; **two** of those suspensions were stayed and the attorneys were placed on probation with conditions;

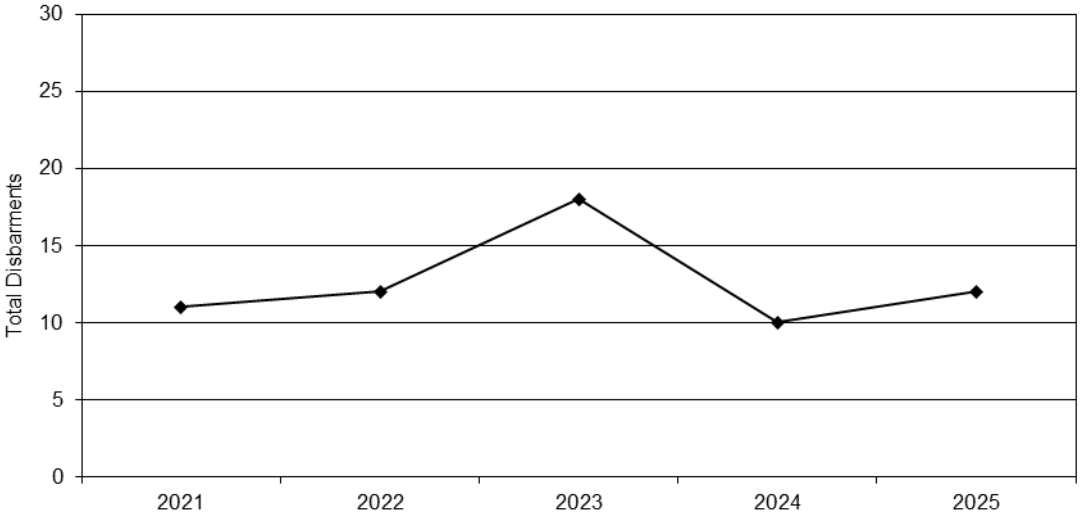
- **18** Eighteen lawyers were suspended pursuant to Rule 5.245 (Failure to Pay Tax);

- **2** Two lawyers received a public reprimand; and

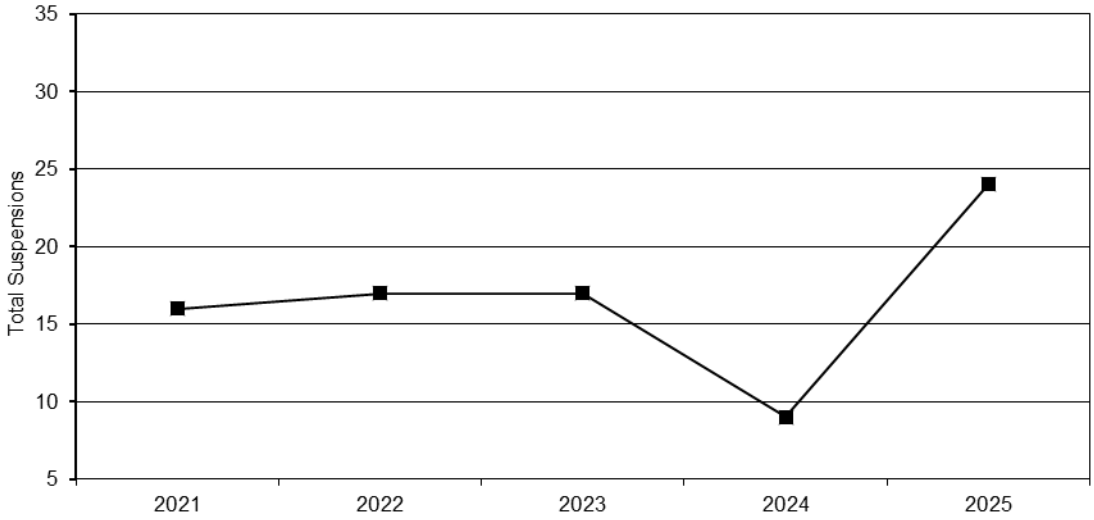
- **53** Fifty-three written admonitions were administered by the Regional Disciplinary Committees and the OCDC.

On occasion, other pending complaints against a lawyer are dismissed upon that lawyer's disbarment or suspension.

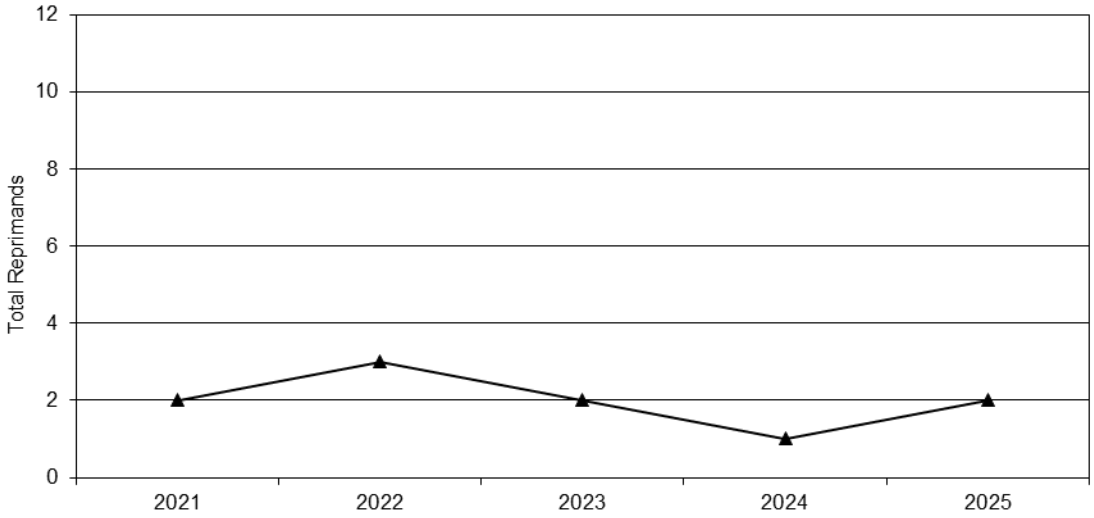
Disbarments



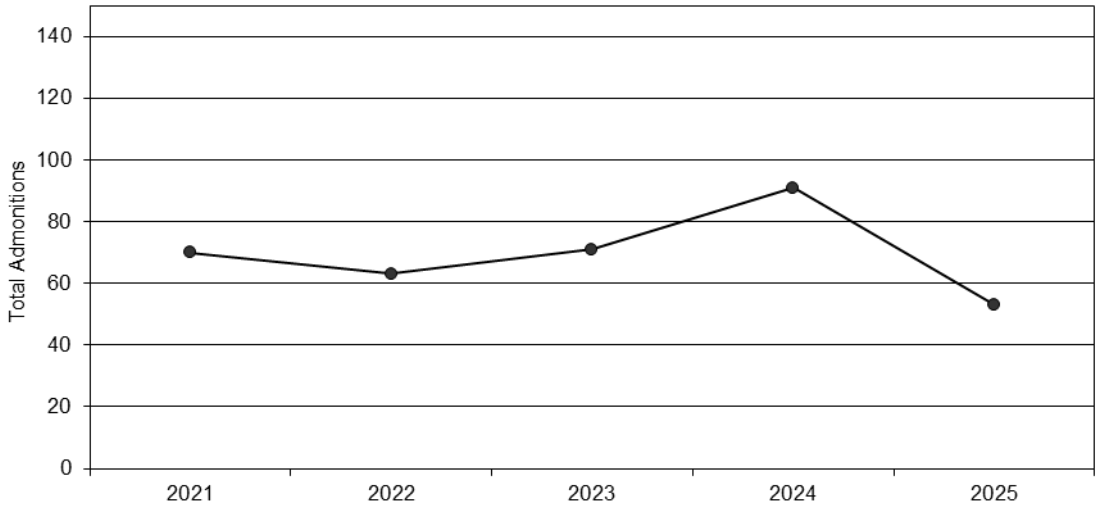
Suspensions

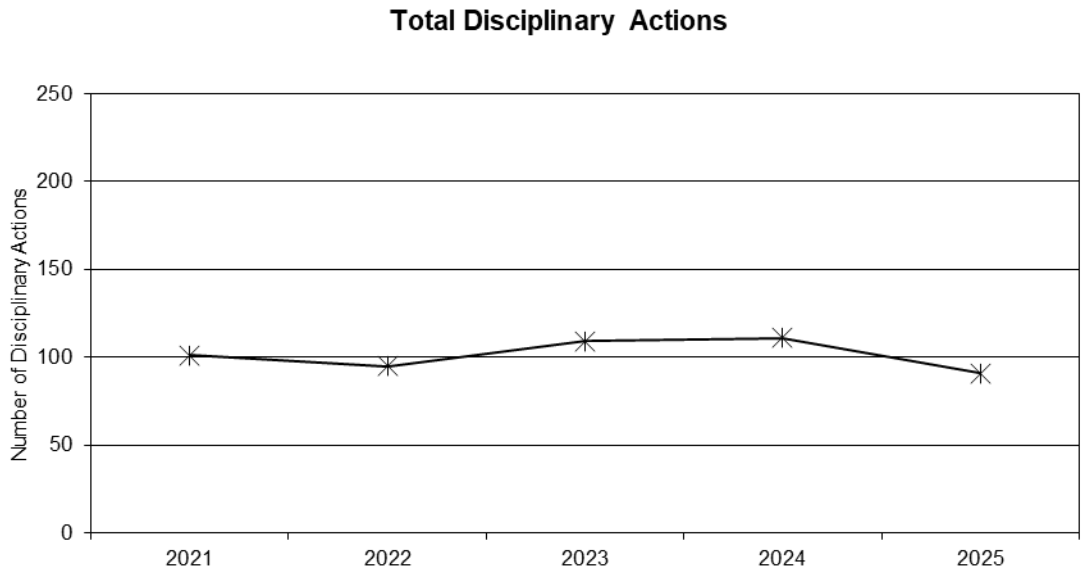


Reprimands



Admonitions





In 2025, there were a total of 91 disciplinary actions including admonitions and formal discipline matters.

The total number of complaints opened as formal investigations during 2025 was 811. The most common complaint areas are as follows:

NATURE OF VIOLATIONS *	NO.
Rule 4-1.4 (Communication)	352
Rule 4-1.3 (Diligence)	348
Rule 4-8.4(c) (Dishonesty, Fraud, Deceit, Misrepresentation)	124
Rule 4-1.5 (Excessive Fees)	114
Rule 4-1.16 (Improper Withdrawal)	100
Rule 4-1.15 (Safekeeping Property)	88
Rule 4-1.1 (Competence)	76
Rule 4-1.7 (Conflicts)	67
Rule 4-1.2 (Client Directives)	52
Rule 4-3.4 (Obstruction/False Evidence)	46
Rule 4-3.3 (Truth to Tribunal)	31
Rule 4-1.6 (Confidentiality)	22
Rule 4-8.4(b) (Criminal Activity)	18
Rule 4-7.2 (Advertising)	17
Rule 4-4.1 (Truth to 3rd Persons)	14
Rule 4-5.5 (Unauthorized Practice)	14
Rule 4-5.3(b) (Supervisory Responsibility)	5
Rule 4-3.5(b) (Ex Parte Contacts)	4
Rule 4-3.6 (Trial Publicity)	4
Rule 4-4.2 (Communication with Person Represented by Counsel)	4
Rule 4-1.14 (Diminished Capacity)	2
Rule 4-4.3 (Dealing with Unrepresented Person)	2
Rule 4-8.2 (Judicial and Legal Officials)	2
Rule 4-8.4(g) (Bias)	2
Rule 4-1.16(a)(2) (Incapacitated Lawyer)	1
Rule 4-3.8 (Prosecutorial Responsibilities)	1
Rule 4-8.3 (Reporting Misconduct)	1

* Many complaints included more than one allegation.

The most prevalent practice areas which resulted in investigations are as follows:

AREA OF PRACTICE *	NO.
Domestic	186
Litigation	104
Other	97
Criminal	89
Torts	68
Estate/Probate	38
Real Property	30
Workers Compensation	17
Traffic	15
Administrative/Governmental	11
Bankruptcy/Receivership	11
Juvenile	10
Landlord/Tenant	9
Collections	8
Immigration/Naturalization	8
Civil Rights	6
Commercial Law	6
Contracts	6
Corporate/Banking	4
Labor Law	4
Consumer Law	2
Guardianship	2
Insurance	2
Patent/Trademark	1
Taxation	1

* Investigations involving trust account overdraft notifications made to the OCDC are not included in this tabulation.

Dated at the Office of Chief Disciplinary Counsel at Jefferson City, Missouri this 24th day of July, 2026.

Respectfully Submitted,

ANDREA K. SPILLARS
Chief Disciplinary Counsel

LEGAL ETHICS COUNSEL ANNUAL REPORT FOR 2025

I. LEGAL ETHICS COUNSEL'S ROLE

A. Informal Advisory Opinions

Pursuant to Rule 5.30(c), the Legal Ethics Counsel issues nonbinding informal advisory opinions to members of the bar about Rules 4, 5, and 6.

The Office of Legal Ethics Counsel provided 1057 oral informal advisory opinions via telephone. Many of these opinions involved multiple questions. Opinions given in conjunction with informal contact at bar meetings and CLE programs are generally not included in this count.

The Office of Legal Ethics Counsel provided 22 written informal advisory opinions.

The Advisory Committee authorized the publication of 10 new informal opinions. Pursuant to Rule 5.30, written summaries of select informal opinions provided by the Office of Legal Ethics Counsel are published for informational purposes for members of the bar. Informal opinions are advisory in nature and are not binding.

The Office of Legal Ethics Counsel is also conducting a comprehensive review of formerly published informal advisory opinions to ensure accuracy and relevance. This is an ongoing project.

B. Continuing Legal Education Presentations

The Legal Ethics Counsel and Staff Counsel prepared and gave 17 continuing legal education (CLE) presentations for various groups including: Cole County Bar Association, Boone County Bar, National Organization of Bar Counsel, Missouri Bankers Association, and more. The Legal Ethics Counsel and Staff Counsel also moderated re-broadcasts of some of these CLE presentations.

II. ROLE OF THE LEGAL ETHICS COUNSEL TO THE ADVISORY COMMITTEE:

Rule 5.07(b) provides that the Legal Ethics Counsel shall serve as staff to the Advisory Committee.

A. Review Summaries

Pursuant to Rule 5.11, the Advisory Committee reviews investigation files if the OCDC or a Regional Disciplinary Committee finds no probable cause and the complainant requests review. The Office of Legal Ethics Counsel summarized and distributed 47 review files to the Advisory Committee.

B. Hearings

The Office of Legal Ethics Counsel assisted Disciplinary Hearing Officers, as requested, with arrangements for hearings.

The Legal Ethics Counsel administered the hearing process to assist the Chair of the Advisory Committee in accordance with Rule 5.1255. As part of this process, the Legal Ethics Counsel proposed hearing panels, provided the file to the hearing panel once the panel was approved by the Chair, monitored the progress of the hearing, and assisted the hearing officers with issues that arose during the course of the process. 12 Informations were filed in 2025.

Rule 5.16 provides, in part:

> (g) Review of Panel Decision for Compliance with Rule 5. The written decision of the disciplinary hearing panel shall be filed with the chair of the Advisory Committee. The chair shall review the panel's decision for the limited purpose of determining that the recommendation for discipline, if any, conforms to this Rule 5 and the sanctions established by the Court. If the chair of the Advisory Committee determines that the panel's recommendation does not conform, the chair shall direct the disciplinary hearing panel to reconsider its recommendation for discipline. After reconsideration, the panel shall file the revised written decision with the chair of the Advisory Committee.
>
> (h) Service of Panel Decision. The chair of the Advisory Committee shall serve the written decision of the disciplinary hearing panel by first class United States mail, postage prepaid, on the respondent or the respondent's counsel if represented, the counsel for the informant, and the Chief Disciplinary Counsel.

The Legal Ethics Counsel performed the majority of these duties on behalf of, and in consultation with, the Chair.

The Legal Ethics Counsel prepared and presented an extensive training program for disciplinary hearing officers and continually updates resources to assist disciplinary hearing officers.

C. Budget

The Legal Ethics Counsel prepared a proposed budget for the Advisory Committee and the Office of Legal Ethics Counsel for 2026.

D. Meetings

The Office of Legal Ethics Counsel coordinated arrangements for regular Advisory Committee meetings. The Office of Legal Ethics Counsel prepared agendas, meeting materials and minutes for these meetings.

E. Formal Opinions

The Legal Ethics Counsel provided assistance to the Advisory Committee in relation to reviewing requests for formal opinions and possible appropriate topics for formal opinions in accordance with Rule 5.30(a).

F. Overdraft Reporting/Financial Institution Approval

Beginning January 1, 2010, Missouri attorneys were required to have their trust accounts at financial institutions "approved" by the Advisory Committee. In order to be approved, the financial institution must enter into an agreement to report insufficient funds situations that arise on attorneys' trust accounts to the Office of Chief Disciplinary Counsel. The Legal Ethics Counsel handled issues related to bank name changes, mergers, etc., as they relate to approved status. The Legal Ethics Counsel maintained a list of approved banks on the office website.

G. Website

In 2023, the Office of Legal Ethics Counsel launched a fully revised website for the Office of Legal Ethics Counsel and Advisory Committee, www.mo-legal-ethics.org. Improvements continue to be made to that website, including expansion of the subject matter index to search for informal opinions.

H. Other matters

The Legal Ethics Counsel wrote articles for publication in the *Journal of the Missouri Bar*. Additionally, the Legal Ethics Counsel served on the Planning Committee for The Missouri Bar's Solo & Small Firm Conference.